

Jonathan S. Chernow (JSC-7339)
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(212) 487-9700
Attorneys for Defendants Brinks Global Services USA, Inc.
and Brinks, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RETAIL TRAVEL SERVICES, INC.,

Plaintiff,

-against-

BANK OF AMERICA, N.A., BRINKS
GLOBAL SERVICES USA, INC. and
BRINKS, INC.,

Defendants.

Docket No.: 07 CV 4617 (CM)

ANSWER TO DEFENDANT
BANK OF AMERICA'S
CROSSCLAIMS

Defendants BRINK'S GLOBAL SERVICES, U.S.A., INC., sued herein incorrectly as
BRINKS GLOBAL SERVICES USA INC. and BRINK'S, INCORPORATED, sued herein
incorrectly as BRINKS, INC. [hereinafter "the BRINKS Defendants"], by their attorneys,
WHITE, FLEISCHNER & FINO, LLP, as and for their Answer to Defendant BANK OF
AMERICA, N.A.'S [hereinafter "BANK OF AMERICA"] CrossClaims, hereby allege as
follows, upon information and belief:

**AS AND FOR THE BRINKS DEFENDANTS' ANSWER
TO BANK OF AMERICA'S FIRST CROSSCLAIM**

1. Deny each and every allegation contained in paragraph "41". of BANK OF
AMERICA'S FIRST CROSSCLAIM.

**AS AND FOR THE BRINKS DEFENDANTS' ANSWER
TO BANK OF AMERICA'S SECOND CROSSCLAIM**

2. Deny each and every allegation contained in paragraph "42". of BANK OF AMERICA'S SECOND CROSSCLAIM.

**AS AND FOR THE BRINKS DEFENDANTS' ANSWER
TO BANK OF AMERICA'S THIRD CROSSCLAIM**

3. Deny each and every allegation contained in paragraph "43". of BANK OF AMERICA'S THIRD CROSSCLAIM.

**AS AND FOR THE BRINKS DEFENDANTS' ANSWER
TO BANK OF AMERICA'S FOURTH CROSSCLAIM**

4. Deny each and every allegation contained in paragraph "44". of BANK OF AMERICA'S FOURTH CROSSCLAIM.

**AS AND FOR THE BRINKS DEFENDANTS' ANSWER
TO BANK OF AMERICA'S FIFTH CROSSCLAIM**

5. Deny each and every allegation contained in paragraph "45". of BANK OF AMERICA'S FIFTH CROSSCLAIM.

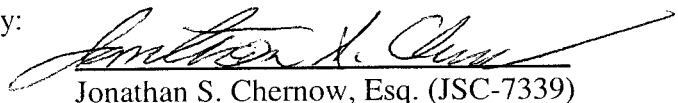
WHEREFORE, the BRINKS Defendants demand judgment dismissing BANK OF AMERICA'S CROSSCLAIMS, together with the costs and disbursements of this action.

Dated: New York, New York
September 12, 2007

Yours, etc.,

WHITE FLEISCHNER & FINO, LLP

By:



Jonathan S. Chernow, Esq. (JSC-7339)

Attorneys for Defendants

BRINK'S GLOBAL SERVICES

U.S.A, INC., s/h/i as BRINK'S GLOBAL

SERVICES USA, INC. and BRINK'S,

INCORPORATED, s/h/i as BRINKS, INC.

140 Broadway - 36th Floor

New York, New York 10005

(212) 487-9700

Our File No.: 404-12961-D-JSC

TO: (See Attached Affidavit)

Expire 3/1/77

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RETAIL TRAVEL SERVICES, INC.,

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-against-

BANK OF AMERICA, N.A., BRINKS
GLOBAL SERVICES USA, INC. and
BRINKS, INC.,

Defendants.

ANSWER TO DEFENDANT BANK OF AMERICA'S CROSSCLAIMS

WHITE FLEISCHNER & FINO, LLP
Attorneys for Defendants Brinks
Global Services USA, Inc. and Brinks, Inc.
140 BROADWAY
NEW YORK, N.Y. 10005
(212) 487-9700

To:

Attorney(s) for

Service of a copy of the within is hereby admitted.

Dated:

.....
Attorney(s) for

PLEASE TAKE NOTICE

☐ that the within is a (certified) true copy of a
entered in the office of the clerk of the within named Court on

NOTICE OF
ENTRY

☐ that an Order of which the within is a true copy will be presented for settlement to the Hon.
one of the judges of the within named Court, at , on , at .

NOTICE OF
SETTLEMENT

Dated:

WHITE FLEISCHNER & FINO, LLP
Attorneys for Defendants Brinks
Global Services USA, Inc.
and Brinks, Inc.
140 BROADWAY
NEW YORK, N.Y. 10005